

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**APPLICATION OF KENTUCKY POWER)
COMPANY FOR (1) RE-AUTHORIZATION OF)
CERTAIN OF ITS EXISTING PROGRAMS;)
(2) AUTHORITY TO DISCONTINUE THE)
COMMERCIAL AND RESIDENTIAL HVAC)
DIAGNOSTIC AND TUNE-UP PROGRAMS;)
(3) AUTHORITY TO AMEND ITS DEMAND-)
SIDE MANAGEMENT PROGRAM TO)
IMPLEMENT RESIDENTIAL HOME)
PERFORMANCE AND RESIDENTIAL)
APPLICANCE RECYLCING PROGRAMS;)
(4) AUTHORITY TO RECOVER COSTS AND)
NET LOST REVENUES AND TO RECEIVE)
INCENTIVES ASSOCIATED WITH THE)
IMPLEMENTATION OF THE PROGRAMS;)
AND (5) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

CASE NO. 2014-00271

**ALEXANDER DESHA AND SIERRA CLUB’S INITIAL REQUESTS FOR
INFORMATION TO KENTUCKY POWER COMPANY**

Pursuant to the Kentucky Public Service Commission’s (“Commission”) September 10, 2014 Order (“September Order”), proposed Intervenor Alexander DeSha and Sierra Club (collectively “Sierra Club”)¹ propound the following requests for information on Kentucky Power Company’s (“KPC” or “the Company”) application in the above-captioned docket.

KPC shall answer these requests for information in the manner set forth in the September Order and by no later than the October 13, 2014 deadline set forth in the Appendix of the September Order. In addition to the undersigned, please produce the responses to the information requests contained herein in electronic format to:

Jill Tauber
Earthjustice

¹ Sierra Club filed a timely motion for leave to intervene in the above-captioned docket on September 15, 2014.

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Wherever the response to a request for information consists of a statement that the requested information is already available to Sierra Club, provide a detailed citation to the document that contains the information. This citation shall include the title of the document, relevant page number(s), and to the extent possible paragraph number(s) and/or chart/table/figure number(s).

In the event that any document referred to in response to any request for information has been destroyed, specify the date and the manner of such destruction, the reason for such destruction, the person authorizing the destruction and the custodian of the document at the time of its destruction.

All documents should be produced in electronic, text-searchable format, and all workbooks should be provided in excel format, where available.

Sierra Club reserves the right to serve supplemental, revised, or additional discovery requests as permitted in this proceeding.

DEFINITIONS

Unless otherwise specified in each individual request, “you,” “your,” “KPC,” or “Company” refers to Kentucky Power Company, and its affiliates, employees, and authorized agents.

“And” and “or” shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these requests for information and for the production of documents any information that might be deemed outside their scope by another construction.

“Any” means all or each and every example of the requested information.

“Communication” means any transmission or exchange of information between two or more persons, whether orally or in writing, and includes, without limitation, any conversation or discussion by means of letter, telephone, note, memorandum, telegraph, telex, telecopy, cable, email, or any other electronic or other medium.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software, and includes all copies, drafts, proofs, both originals and copies either (1) in the possession, custody or control of the Company regardless of where located, or (2) produced or generated by, known to or seen by the Company, but now in its possession, custody or control, regardless of where located whether or still in existence.

Such “documents” shall include, but are not limited to, applications, monitoring reports, computer printouts, contracts, leases, agreements, papers, photographs, tape recordings, transcripts, letters or other forms of correspondence, folders or similar containers, programs, telex, TWX and other teletype communications, memoranda, reports, studies, summaries, minutes, minute books, circulars, notes (whether typewritten, handwritten or otherwise), agenda, bulletins, notices, announcements, instructions, charts, tables, manuals, brochures, magazines, pamphlets, lists, logs, telegrams, drawings, sketches, plans, specifications, diagrams, drafts, books and records, formal records, notebooks, diaries, registers, analyses, projections, email correspondence or communications and other data compilations from which information can be obtained (including matter used in data processing) or translated, and any other printed, written, recorded, stenographic, computer-generated, computer-stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated or made.

Without limitation, the term “control” as used in the preceding paragraphs means that a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or public or private entity having actual possession thereof. If a document is responsive to a request, but is not in your possession or custody, identify the person with possession or custody. If any document was in your possession or subject to your control, and is no longer, state what disposition was made of it, by whom, the date on which such disposition was made, and why such disposition was made.

For purposes of the production of “documents,” the term shall include copies of all documents being produced, to the extent the copies are not identical to the original, thus requiring the production of copies that contain any markings, additions or deletions that make them different in any way from the original.

“DSM” means demand-side management, including energy efficiency/conservation and load management programs.

“Identify” means:

- (a) With respect to a person, to state the person's name, address and business relationship to KPC (e.g., "employee");
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

"Workpapers" means original, electronic, machine-readable, unlocked, Excel format (where possible) with formulas intact.

PRIVILEGE

If you claim a privilege including, but not limited to, the attorney-client privilege or the work product doctrine, as grounds for not fully and completely responding to any request for information, interrogatory or request for production, describe the basis for your claim of privilege in sufficient detail so as to permit Sierra Club or the Commission to evaluate the validity of the claim. With respect to documents for which a privilege is claimed, produce a "privilege log" that identifies the author, recipient, date and subject matter of the documents or response for which you are asserting a claim of privilege and any other information pertinent to the claim that would enable Sierra Club or the Commission to evaluate the validity of such claims.

REQUESTS FOR INFORMATION

- 1.1 Please provide all KPC responses to requests for information from all parties and Commission Staff in this proceeding.
- 1.2 Please provide Application Exhibit 8 in machine readable electronic format with formulas intact and cells unprotected.
- 1.3 Please provide the Company's total DSM costs for 2014, including total costs incurred to date and total estimated costs for the year.
- 1.4 For each year of the proposed program period, 2015-2017, please provide the estimated total DSM program costs for each existing program the Company proposes to continue, by the subcategories of "total program costs" provided in the DSM Status Report (Amended Application Exhibit 3).
- 1.5 For each year of the proposed program period, 2015-2017, please provide the participant forecast for each program the Company proposes to offer (both existing and new).
- 1.6 Please provide the projected energy savings, both in megawatt hours and as a percentage of retails sales, for each year of the proposed program period, 2015-2017.

- 1.7. Please provide the projected demand savings for each year of the proposed program period, 2015-2017.
- 1.8. Please refer to paragraph 20 of the Application (page 10), which states that “[b]y this application the Company is seeking all required authorizations to implement two new DSM programs in furtherance of the identified portion of Paragraph 12 of the Stipulation and Settlement Agreement.”
 - a. Please fully explain how the Company’s proposal in this case facilitates KPC’s compliance with the Commission’s October 7, 2013 order in Case No. 2012-00578 approving the Stipulation and Settlement Agreement with modifications.
 - b. Please state whether the two new DSM programs proposed in this case are the sole means by which the Company proposes to meet its obligations to increase its DSM/EE investment under the Stipulation and Settlement Agreement in its proposed 2015-2017 DSM/EE plan. If not, please explain.
 - c. Please provide all analyses, workpapers and other documents that inform and/or support the Company’s determination as to how to comply with its DSM investment obligations for 2015-2017 pursuant to the Commission’s October 7, 2013 order in Case No. 2012-00578.
- 1.9. For each of the following programs, please explain the reason for the Company’s proposed modifications and provide the expected change in demand and energy savings for each program from 2014 to 2015:
 - a. Residential Efficient Products
 - b. Community Outreach CFL
 - c. Energy Education for Students
 - d. Modified Energy Fitness
 - e. Mobile Home High Efficiency Heat Pump
 - f. High Efficiency Heat Pump
 - g. Targeted Energy Efficiency programs.
- 1.10. Please refer to paragraphs 42 and 43 of the Application (pages 16-17). Please state whether the Company anticipates seeking approval of additional DSM/EE programs in 2015.
- 1.11. Please confirm that the market potential study that is underway did not inform the pending application. If you cannot confirm, please explain.

- 1.12. Please confirm that the market potential study that is underway will evaluate the potential for DSM savings in the industrial customer sector. If you cannot confirm, please explain.
- 1.13. Please state whether the market potential study will inform future DSM spending by the Company.
- 1.14. Please state whether the Company intends to modify its spending plan within the 2015-2017 timeframe to incorporate recommendations or findings from the market potential study.
- 1.15. Please state when the Company plans to submit its next DSM filing.
- 1.16. Please explain whether and how the proposed DSM Market Potential Study will inform the Company's next DSM filing.
- 1.17. Please state whether the next DSM filing will reflect the increased DSM spending level required under the Commission's October 7, 2013 order in Case No. 2012-00578.
- 1.18. Now that the market potential study is underway, please explain the role the Company expects the Collaborative to play in the development of the study.
- 1.19. Please provide a detailed timeline for completing and filing the potential study by August 15, 2015, including any milestones pertaining to Collaborative review.

Dated: September 29, 2014

Respectfully submitted,



JOE F. CHILDERS
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CERTIFICATE OF SERVICE

I hereby certify that Sierra Club's September 29, 2014 electronic filing is a true and accurate copy of Alexander Desha and Sierra Club's Initial Requests for Information to Kentucky Power Company to be filed in paper medium; and that on September 29, 2014, the electronic filing has been transmitted to the Commission, and that one copy of the filing will be delivered to the Commission, that no participants have been excused from electronic filing at this time, and electronic mail notification of the electronic filing is provided to the following:

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